

REMARKS

In response to the Office Action of November 27, 2007, Applicants respectfully request reconsideration. To further the prosecution of this application, each of the rejections set forth in the Office Action has been carefully considered and is addressed below. The application as presented is believed to be in condition for allowance.

Rejections Under 35 U.S.C. §103

The Office Action rejects claims 1, 3-4, 6, 8, 10-12, 14, 17, 18, 20, 21, 23, 25, 28, 29, 31, 33, and 35-38 under 35 U.S.C. §103(a) as purportedly being obvious over Reber (6,061,758), and rejects claims 2, 5, 7, 9, 13, 15, 16, 19, 22, 24, 26, 27, 30, 32, and 34 as purportedly being obvious over Reber in view of various other references. In view of the amendments made to independent claims 1, 10, 17, and 18, Applicants believe that the claims as pending are patentable over the cited art and respectfully request withdrawal of each of these rejections.

Discussion of Reber

Reber is directed to a system and method for managing storage and retrieval of media data. Reber describes that when editing media (i.e., video and audio data) on either a linear or non-linear system, source material from a source, such as a video tape or audio recording, is broken down into a series of separate clips representing the material desired for the final master (Col. 1, lines 44-47). The clips may then be reassembled into a final sequence achieving the desire of the editor and producer (Col. 1, lines 47-49). In a typical non-linear system, digitized sections of the original source are stored in media files in system storage. Each clip is associated with one of these media files so that the clips could refer to the media files when certain information about the source media was needed, such as the original source name or nature of the media (Col. 1, lines 51-60).

Reber further describes that in conventional systems, when source material is captured, information about the clip (i.e., "media data") and its actual digitized data are either coresident or linked directly together (Col. 2, lines 19-24). When the clip is manipulated or edited, the media data that is tied to it is used (Col. 2, lines 29-31). Any information about the source from which the

particular clip came would also need to be stored with each clip (Col. 2, lines 31-33). As a result, all clips would be needed at any time to determine the breadth of any source relationships and, if any new source relationships were developed, it would be difficult to inform all the clips of the new information (Col. 2, lines 33-37). Additionally, it would be necessary to duplicate media data if certain clips or segments overlapped or were contained entirely within one another (Col. 2, lines 37-41).

To solve these problems, Reber proposes the system shown in Figure 1, which includes a media file manager (MFM) and a source manager (SM) (Col. 3, lines 51-64). A user accesses and operates on digitized media files by calls placed from the editing system to the MFM which creates and manages the media files (Col. 3, lines 64-66). The MFM interacts with the SM which maintains a table of relations between the linear media data recorded on source tapes and the digitized media files (Col. 3, line 66 – Col. 4, line 2). The MFM is responsible for management of all media that is present at any time and available to the system for use (Col. 4, lines 30-32). The MFM's purpose is to locate media specified by a user request. The user's request consists of a range of time from some specific source.

The MFM has an internal abbreviation of all media that is known to be accessible to it, and where and how that material may be retrieved (Col. 4, lines 46-49). This internal abbreviation may be a linked list which is initialized when the application is invoked (Col. 5, lines 20-24). The MFM initializes the linked list by scanning all disk drives on the system and determining if the media file database is valid by comparing the time stamp on each media file with the time stamp on the directory in which it was stored (Col. 5, lines 28-30). If the time stamps are equal, then the database is valid (Col. 5, lines 31-33).

A user request to the MFM uses the `Mfm_handle` call and is comprised of a source unique identifier or "id", a range on the source, type of media, and the physical channel requested if any that the source media was recorded from (Col. 5, lines 44-52). To process this request, the MFM sifts through the linked list, and, if a match is found then the handle to that record is returned to the requestor (Col. 5, lines 52-57).

Once the user has a handle to the requested record the user can use the call `Mfm_open` to actually obtain media data from the media source (Col. 6, lines 2-3). The user can also use the call

Mfm_read to pass actual media data from the media source into a buffer specified by the caller (Col. 6, lines 10-12). The Mfm_close call is used to allow MFM to close the channel to the media source. If the media channel is open for write, the call examines a parameter which indicates caller specific information (Col. 6, lines 28-30).

Claim 1

Claim 1, as amended, is directed to a method of operating a computer system to validate the data defining a design of an integrated circuit. The method comprises: storing said data in a plurality of data files in a database each of said data files having an associated file type and being arranged in a plurality of data stores in said data base, each of said data stores relating to a different aspect of said design, wherein at least one of said data files is a data dependent file containing data dependent on data in one or more other of said data files; selecting a file locator which is associated with a respective one of said data stores in said data base relating to a respective one of said aspects of the design; using said selected file locator to identify a first data dependent file from said data files and to identify one or more other of said data files upon which said first file is dependent; for each of said identified files, selecting a first file reader associated with the file type of the identified file; using said selected first file reader, determining a predetermined parameter of said identified file; comparing the predetermined parameter from the first file with that from each other file; and responsive to said comparison step, providing an output signal for each data file indicating whether the data file is valid for use in manufacture of said integrated circuit.

A. Reber Is Unrelated To Validating a Design of An Integrated Circuit

Reber does not disclose or suggest a method of operating a computer system, “to validate the data defining a design of an integrated circuit,” and “providing an output signal for each data file indicating whether the data file is valid for use in manufacture of said integrated circuit,” as recited in claim 1. As discussed above, Reber is directed to the storage and retrieval of media files in a video editing system. Reber is entirely unrelated to determining whether data defining a design of an integrated circuit (or any other design) is valid. Indeed, Reber is entirely unrelated to validating

a design, as it is entirely focused on techniques for storing and retrieving media clips in a video editing system.

B. Reber Does Not Disclose Identifying Data Files On Which A First File Depends

Reber fails to disclose or suggest, “using said selected file locator to identify a first data dependent file from said data files and to identify one or more other of said data files upon which said first file is dependent.”

The Office Action asserts that Reber discloses a “file locator” via the source identifier that is used to identify, in part, a media clip to which a user requests access. The Office Action asserts that Reber discloses using the “file locator” to identify data files on which a first data file depends at col. 5, lines 52-56. *See* Office Action, page 4. Specifically, the Office Action appears to assert that the linked list disclosed by Reber is one or more other files on which the first file depends. Applicants respectfully disagree with this reasons.

First, the source identifier of Reber is not used to find data files on which a first data file depends. Rather, the source identifier is used to identify a particular media source which includes media content to which the user requests access. That is, as discussed above, when a user desires to access media content, the user submits a request to the MFM that identifies, *inter alia*, the source on which the media content resides, and the range on that source where the desired media content is located. The MFM uses this information to access the requested media content. Thus, the source identifier does not identify data files on which a first data files depends and the MFM does not use the source identifier for anything other than to determine the source on which the requested media content resides.

Second, the linked list disclosed by Reber does not include data files on which a first data file depends. That is, Reber discloses that the linked list is a data structure that the MFM uses to determiner what media is available on the system at the current time. *See* Reber, col. 5, lines 21-25. Nowhere does Reber disclose that the linked list includes data files on which a first data file is dependent.

C. Reber Does Not Disclose Determining A Predetermined Parameter For A File

Reber does not disclose or suggest, “using said selected first file reader, determining a predetermined parameter of said identified file,” as recited in claim 1. The Office Action asserts that Reber discloses, at col. 6, lines 28-32, that each media file has a predetermined parameter. The cited portion of Reber discloses that when a media channel is open for a write (i.e., a user is requesting to write media content to the media source) and a users calls the Mfm_close routine to close the media channel, a parameter which indicates caller specific information is examined (col. 6, lines 22-31). Thus, the Office Action appears to read the predetermined parameter for each file recited in claim 1 on the parameter that is passed when a routine is called. Applicants respectfully disagree with this interpretation.

That is, when the Mfm_close routine is called, caller-specific information (referred to in Reber as a parameter) is provided by the user. This information is not a parameter of a file, but rather is a parameter of the Mfm_close routine. Thus, Reber does not disclose determining a predetermined parameter of said identified file.

Moreover, even if the caller specific information is considered to be a predetermined parameter of a file (though clearly it is not), Reber does not disclose or suggest using the first file reader to determine the predetermined parameter, as required by claim 1. The Office Action asserts that the type of media (video or audio), which is specified in the request to access a media clip, is a first file reader. However, nowhere does Reber disclose or suggest that the information indicating whether a requested media clip is a video or audio file is used to determine a parameter of a file.

D. Reber Does Not Disclose Comparing the Predetermined Parameter From The First File With That From Each Other File

Reber does not disclose or suggest, “comparing the predetermined parameter from the first file with that from each other file,” as recited in claim 1. As discussed above, the Office Action asserts that Reber discloses, at col. 6, lines 28-32, that a media file has a predetermined parameter by virtue of the fact that when the Mfm_close routine is called, a parameter specifying caller specific information is provided.

However, Reber does not disclose comparing the caller specific information (the alleged “predetermined parameter”) with other caller specific information. Indeed, the Office Action does not even allege that Reber does disclose this, as the Office Action asserts that Reber discloses comparing the predetermined parameter for the first file with that from each other file at col. 5, lines 20-35. This portion of Reber discloses the mfm_init routine initializes the linked list that indicates what media is available on the system by scanning all disk drives on the system and determining if the short-hand version of the media file database is valid. The routine determines that this database is valid by comparing the timestamp on the file with the timestamp on the directory in which it is stored. Applicants respectfully disagree that the cited portion of Reber discloses this limitation of claim 1.

First, this portion of Reber relates to comparing timestamps. This portion of Reber does not disclose or suggest comparing the caller specific information (i.e., the alleged “predetermined parameter”). Second, this portion discloses comparing the timestamp on a **file** with the timestamp on the **directory** in which the file resides. Reber does not disclose or suggest comparing a predetermined parameter of one **file** with a predetermined parameter of another **file**.

E. Summary

As should be clear from the discussion above, Reber fails to disclose or suggest many of the limitations of claim 1. Accordingly, it is respectfully requested that the rejection of claim 1 be withdrawn.

Claims 2-9 and 35 depend from claim 1 and are patentable for at least the same reasons. Accordingly, it is respectfully requested that the rejection of these claims be withdrawn.

Independent Claims 10, 17, and 18

As should be clear from the discussion above, each of independent claims 10, 17, and 18 includes limitations that are not disclosed or suggested by Reber. Accordingly, it is respectfully requested that the rejection of claims 10, 17, and 18 be withdrawn.

Claims 11-16 and 36 depend from claim 10, claims 19-26 and 37 depend from claim 17, and claims 27-34 and 38 depend from claim 18. Each of these dependent claims is patentable for at

least the same reasons as the independent claim from which it depends. Accordingly, it is respectfully requested that the rejection of these claims be withdrawn.

CONCLUSION

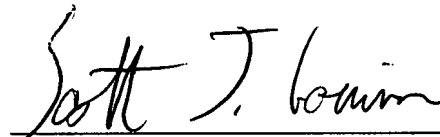
A Notice of Allowance is respectfully requested. The Examiner is requested to call the undersigned at the telephone number listed below if this communication does not place the case in condition for allowance.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 23/2825.

Dated: April 27, 2007

Respectfully submitted,

By:



Scott J. Gerwin, Reg. No. 57,866
Wolf, Greenfield & Sacks, P.C.
600 Atlantic Avenue
Boston, Massachusetts 02210-2206
Telephone: (617) 646-8000